

*California Commission on Teacher Credentialing*

*Meeting of  
December 3-4, 2003*

**AGENDA ITEM NUMBER:**        **PREP - 2**

**COMMITTEE:**                      **Preparation Standards**

**TITLE:**                              **Proposal for Revision of The Commission's  
Accreditation Policies and Procedures**

  **X**   **Action**

       **Information**

       **Report**

**Strategic Plan Goal(s):**

**Goal 1:**        **Promote educational excellence through the preparation and certification of  
professional educators**

- Sustain high quality standards for the preparation of professional educators
- Sustain high quality standards for the performance of credential candidates

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**Proposal for Revision of the Commission's Accreditation  
Policies and Procedures  
Professional Services Division  
December 3-4, 2003**

**Executive Summary**

Pursuant to California Education Code, the Commission may approve institutions whose teacher education programs meet the standards prescribed by the Commission, to recommend to the Commission the issuance of credentials to persons who have successfully completed those programs. The Education Code further provides the Commission with authority to adopt, implement, and modify an accreditation framework which sets forth the policies of the Commission regarding the accreditation of educator preparation in California.

This agenda item sets forth the Commission's current responsibilities related to accreditation of teacher preparation programs, describes activities undertaken by staff to begin to consider improvements to the existing system, and outlines a plan for future activities related to the revision of accreditation policies and procedures for Commission consideration. The report also identifies four policy goals that, if the Commission agrees, will help guide staff as it moves forward in developing recommended revisions to the accreditation system. And finally, the report presents for Commission consideration some key elements of the current accreditation system and offers comments on each of those elements for Commission discussion and consideration as a way to help guide staff in the coming months.

**Fiscal Impact Summary**

Currently, the expenses related to the accreditation of teacher preparation programs are supported by the base budget of the Commission. The fiscal impact of any revisions will be dependent upon the nature of those revisions. As the Commission considers possible revisions to the system, staff will include, to the extent possible, information about the fiscal impact of any proposed changes.

**Policy Issues to be Addressed**

Should the Commission direct staff to begin the process outlined in this agenda item for bringing forth recommended changes to the accreditation system to the Commission for its adoption and eventual implementation? Further, does the Commission agree to the conceptual changes proposed by staff to the key elements of the existing accreditation process such that staff can use these ideas to help guide them in the future.

**Recommendation(s)**

That the Commission agree to the four policy goals for a revised accreditation system, direct staff to begin implementation of the plan for consideration and adoption of revision as described in this item and concur with the conceptual changes to the key elements of the existing accreditation system.



# **Proposal for Revision of the Commission's Accreditation Policies and Procedures**

## **Professional Services Division**

**December 3-4, 2003**

### **Summary**

Currently, California has approximately 85 institutions of higher education and alternative certification programs that prepare educators. Together, total enrollment in these programs in 2002 was nearly 80,000. The California Commission on Teacher Credentialing (CCTC) is the state agency responsible for ensuring that teachers who are entrusted with the education of the state's students have been adequately prepared and possess appropriate knowledge, skills, and abilities to teach in the public schools. Arguably, the two most critical functions the Commission performs to achieve this objective on behalf of the people of California are the licensing of teachers and ensuring that educator preparation programs are of sufficient quality. Accreditation is the primary vehicle by which the Commission achieves this latter function.

Over the past few years, the Professional Services Division has undertaken an accreditation study for the purposes of evaluating the Commission's accreditation policies and procedures and making modifications that would lead to a stronger, more cost efficient accountability system.

A major component of this research effort was completed this past spring by the American Institutes for Research (AIR) who contracted with the Commission to conduct an evaluation of the *Accreditation Framework*. The purpose of this three year study, which was finalized in March 2003, was to examine the policies and procedures found in the Commission's *Accreditation Framework* and *Accreditation Handbook* including the Commission's processes and procedures for conducting accreditation visits, training of the Board of Institutional Reviewers (BIR) for site visits, and the question of whether the current process allows for a fair and productive review that supports program and institutional improvement. A final report was submitted by AIR to the Commission's executive director for further consideration. That report contains numerous findings and recommendations that are summarized in this item.

To address the larger policy questions about accreditation systems, the executive director asked several members of the Commission staff to examine specific issues related to accreditation of educator preparation programs not addressed in the AIR report. In particular, staff was directed to gather information about California's existing accreditation system costs, information about how key states conduct and fund program review or accreditation, and examine how the Commission's current accreditation system compares with other states in trends and practice.

This report contains a description of the Commission's legislative mandate with respect to accreditation and a brief overview of the current process, a summary of the findings of the AIR report, a description about the changes in state and national policy environments that have taken place that demand a greater focus on accountability, and activities that staff has been engaged in over the past several months. The report sets forth a plan for developing revisions to the Commission's existing accreditation system over the next six months, asks that the Commission

consider four policy goals, and provides staff comments and analysis about key elements of the existing process that will help guide staff in the coming months.

Since adoption the current *Accreditation Framework* eight years ago, a new environment exists in which the Commission and all of education must operate. The Commission is now in a position to consider changes to the existing accreditation system that would lead to a stronger, more effective accountability system that is responsive to the current context in which the Commission operates.

It is critical to note that this item presents several seemingly disparate items. However each of these items is important in understanding the overall context for considering accreditation revisions. Based on the information presented here, the Commission staff recommends that Commission consider the following seven critical questions:

- 1-Should the Commission continue a standards-based accreditation system?
- 2-Should entity under review continue to be institutional focused or should the Commission consider moving back to a program approval system?
- 3-Should the Commission consider an accreditation framework that relies primarily on professional judgement and peer review?
- 4-Should the Commission consider the use of self-studies as the primary means for an institution to demonstrate it meets the standard?
- 5-Should the Commission restructure the external review process to ensure greater oversight of educator preparation programs?
- 6-Should the Commission reconsider the current regular review cycles?
- 7-Should the Commission's accreditation system consider altering its current focus on a point-in-time accreditation?

These seven questions are discussed in greater depth toward the end of this report. Should the Commission respond in the affirmative to the above questions, then Commission staff would address those questions in developing a revised system.

### **The Commission's Legislative Mandate and Overview of Current Accreditation Process**

California's accreditation system is governed by California Education Code Sections 44370 through 44374. Reference to these Education Code sections is critical to understanding the underlying philosophy, purpose, and duties of California's accreditation system.

Section 44370 establishes the legislative findings and declarations and reads:

"The Legislature finds and declares that the competence and performance of professional educators depends in part on the quality of their academic and professional preparation. The Legislature recognizes that standards of quality in collegiate preparation complement

standards of candidate competence and performance, and that general standards and criteria regarding the overall quality of a candidate's preparation are as essential as the assessment of the candidate's competence and performance."

Pursuant to the Education Code, the Commission is responsible for oversight of the accreditation framework. Specifically, the Education Code delegates to the Commission responsibility to:

- Adopt and Modify the *Accreditation Framework*
- Establish and Modify Standards for Educator Preparation
- Initial Accreditation of Institutions
- Hear and Resolve Accreditation Appeals
- Appoint the Committee on Accreditation
- Address Issues and Refer Concerns Related to Accreditation
- Review Annual Reports by the Committee on Accreditation
- Allocate Resources Annually for Accreditation Operations
- Jointly sponsor an External Evaluation of Accreditation Policies and Practices

The Education Code also delegates specific authority to the Committee on Accreditation (COA). In accordance with these sections of the Education Code, the COA is generally responsible for carrying out the policies enacted by the Commission and is responsible for accreditation decisions. Specifically, the Education Code delegates the following responsibilities to the COA:

- Comparability of Standards
- Initial Accreditation of Programs
- Continuing Accreditation Decisions
- Accreditation Procedures
- Monitor the Accreditation System
- Prepare Annual Reports, Recommendations and Responses
- Meet in Public Sessions
- Jointly Sponsor, with the Commission, an External Evaluation of Accreditation Policies and Practices

The Commission's current *Accreditation Framework* was adopted in 1995 following enactment of SB 148 by Senator Marian Bergeson (Chapter 1455, Statutes of 1988) and SB 655 (Bergeson, Chapter 426, Statutes of 1993). This adoption marked a significant change in the manner in which the Commission examined and approved educator preparation programs. Previous to the new *Accreditation Framework*, the Commission reviewed credential programs within an institution independent of one another; a process referred to as "program approval." Under the process put in place during the mid 1990's and that continues to date, the Commission's review examines all educator preparation programs offered by an institution and makes a recommendation related to the accreditation of the unit as a whole, not of each individual program.

California's adopted *Accreditation Framework* defines professional accreditation as the "process of ascertaining and verifying that, at each college and university that prepares individuals for state certification, sufficient quality characterizes that preparation." The Commission has adopted standards that each program of educator preparation is expected to implement. Accreditation is a means to ensure that these standards are indeed being implemented by the programs.

The Education Code specifies the duties of California's accreditation framework. Section 44371 requires that the Commission's accreditation system do all of the following:

- (1) Concentrate on the overall quality of educator preparation in credential programs
- (2) Hold professional elementary, secondary and postsecondary educators responsible for quality in the preparation of professional practitioners.
- (3) Contribute to improvements in educator preparation and recognize excellence in preparation programs and institutions.
- (4) Replace the prior system of program approval, as established by the Teacher Preparation and Licensing Act of 1970.
- (5) Be governed by an accreditation framework that sets forth the policies of the Commission on Teacher Credentialing regarding the accreditation of educator preparation.

In addition, it requires that the framework do the following:

- (1) Establish broad, flexible policies and standards for accreditation of educator preparation.
- (2) Define the accreditation responsibilities, authority, and roles of the Commission on Teacher Credentialing and the Committee on Accreditation.
- (3) Establish an accreditation system that is efficient and cost effective.
- (4) Require that accreditation decisions be based on sufficient, reliable evidence about the quality of educator preparation.

Major components of the system include previsits and technical assistance to the institution by the Commission staff and a team leader as well as development by the institution of a comprehensive self study document that demonstrates how the institution meets the appropriate standards of quality and effectiveness. The review consists of the selection of a team with the size, skill, and expertise appropriate for the institution being reviewed. The purpose of the site visits is to gather evidence including reviewing substantial documentation and conducting interviews with students, faculty, and administrators, to triangulate data, and to reach conclusions about whether the programs and services offered by an institution meet the Commission's adopted standards of quality and effectiveness.

Following a site review, the accreditation team makes a recommendation for accreditation to the Committee on Accreditation. The team may recommend one of the following actions: accreditation; accreditation with stipulations – either technical or substantive; accreditation with probationary stipulations or denial of accreditation.

The team presents its findings to the Committee on Accreditation at which time they discuss issues raised by the review team. After discussion, the Committee on Accreditation formally votes on an accreditation finding.

Institutions that are accredited with technical, substantive, or probationary stipulations are required to take action that results in the removal of the stipulations within one year. Institutions are required to prepare a written report with appropriate documentation that the stipulations have been appropriately addressed. In the case of substantive or probationary stipulations, institutions are also required to prepare for a revisit that focuses on the areas of concern noted by the accreditation team during the original visit. The report of the actions taken to remove the stipulations and of the revisit team is to be received and acted upon by the Committee on



Accreditation within one calendar year of the original visit. Throughout this process, technical assistance from the Commission staff is available to the institution.

An institution receiving denial of accreditation is required to take immediate steps to close all credential programs at the end of the semester or quarter in which the Committee on Accreditation action took place, file a plan for discontinuation, and seek to assist students to complete their program requirements through alternative means.

## **Findings of the Report of the American Institutes of Research (Air)**

Education Code Section 44372 (h) required that the Commission, with the Committee on Accreditation, jointly design an evaluation of accreditation policies and their implementation, and jointly select an external evaluator to conduct the evaluation in accordance with the *Accreditation Framework*. The Commission has fulfilled this mandate. In March 2003, the American Institutes for Research (AIR) issued its final report on the Evaluation of the *Accreditation Framework* Policies and Procedures. The purpose of this study was to examine the policies and procedures found in California's *Accreditation Framework* and *Accreditation Handbook*, the Commission's processes and procedures for conducting accreditation visits, the preparation of the Board of Institutional Reviewers (BIR) for site visits, and the question of whether the current process implemented by the Commission allows for a fair and productive review that supports program and institutional improvement.

It is important to note that the design of the study and the collection of these data preceded implementation of the SB 2042 standards and other numerous reform measures. While these recommendations and suggestions are important for consideration, they are limited in utility.

### **Phase I**

The AIR study was comprised of two phases. The first phase included: 1) a review and analysis of pertinent documentation; 2) observation of accreditation visits; 3) observation of new BIR member orientation and training; 4) development of site visit profiles; 5) interviews with key informants; 6) an analysis of the *Accreditation Framework*; 7) development of databases related to site visits; and 8) observation of COA meetings. The first phase resulted in identification of some emerging themes and issues that were recommended for further exploration. Three recommendations resulted from the first phase of the project. These recommendations are:

- 1) *Clarification of Standards* - AIR reported that their review of documentation and initial interviews revealed a prevailing difficulty in discerning the standards by which an institution is being evaluated. They recommended that the information about standards be located and labeled clearly as associated with specific programs within an institution using consistent terminology and numbering systems.
- 2) *Development of Reports* – AIR recommended that clearer guidelines be given to institution representatives developing self-studies or accreditation reports, and that accreditation team members be reviewed to determine how to accommodate the lack of consistency and transparency in documents related to the site visits.
- 3) *Documentation and Recordkeeping* – AIR recommended that recordkeeping and document maintenance procedures at the CCTC be reviewed and revised to ensure that all materials could be easily located, checked out as needed, and returned.

### **Phase II**

Face-to-face interviews, telephone interviews, and surveys comprised an important aspect of Phase II research. AIR surveyed three distinct groups: CCTC Board of Institutional Reviewers (BIR) who participated in accreditation site visits; higher education representatives involved in the accreditation process; and district staff -- graduates, master teachers, and employers of

candidates at institutions accredited in 2000-01 and 2001-02. In addition, Phase II included an analysis of the *Accreditation Framework* and *Accreditation Handbook*; case studies of institutions undergoing the accreditation process, database development, a profile development database, data analysis, interviews with COA members, and attendance at state meetings.

## **AIR Phase II Findings and Recommendations**

In general, the AIR summarizes its findings as follows:

The overall sentiment of stakeholders is that the peer review of education preparation programs effectively serves the goals and objectives of accreditation as defined by the process and procedures in the *Accreditation Framework* and *Handbook*. Even though the process of preparing for accreditation is long and arduous, it provides IHE's an invaluable opportunity to self-examine their programs and practices to allow them to identify weaknesses and improve their programs through a self-reflective process. The process allows the accreditation team of peers to make an informed assessment of the educator preparation programs from the self-study documentation and on-site review, and to produce a report and recommendations for the COA's consideration. (AIR Report, page 10)

The research conducted by AIR in the second phase centered around four general questions. In its final report, AIR responds to those questions with key findings as well as related recommendations. These findings and recommendations are reproduced verbatim below.

**AIR Research Question 1.** *Are the policies and procedures outlined in the Accreditation Framework and Accreditation Handbook and implemented since 1997 yielding the kind of information that is in keeping with the avowed goals, purposes and functions of a professional accreditation system?*

### ***Key Findings:***

1. The CCTC process, as dictated by the Accreditation Framework, is based upon the high standards that reflect the theoretical and practical goals and direction of the various subsets of the education profession. With the implementation of the Teaching Performance Assessment (TPA), based upon the SB 2042 Teaching Performance Expectations, the CCTC is moving even more closely toward the performance outcomes that have become prevalent within the profession.
2. The CCTC partnership with National Council for Accreditation of Teacher Education (NCATE) reflects a strong commitment to assist California institutions seeking national accreditation. This commitment is reflected in the recently renegotiated partnership between the Commission and the National Council. Challenges to implementing this partnership include issues of alignment between CCTC and NCATE standards and the subjective personal interaction between state and national teams in data collection and decision making.

### ***Recommendations related to standards:***

- 1) Standardize the processes related to transitions to new standards through new language in the *Accreditation Handbook*.
- 2) Review the need for maintaining Option 3, General Program Standards.
- 3) Attempt to standardize the formats for documentation required of IHEs, specifically for the self-study report.
- 4) Begin a dialogue with IHEs regarding appropriateness of standards for non-traditional models or programs as to whether they consider the standards as they currently exist to be appropriate and valid measures of quality of their institutions.

### ***Recommendations regarding training and orientation***

- 1) Provide more and ongoing orientation for COA members.
- 2) Provide more training and professional development to CCTC staff than is currently available to them.
- 3) Include a historical perspective of past performance in the accreditation process into team and COA decision-making considerations.

### ***Other related recommendations:***

- 1) Amend the *Framework* to allow for greater sanctions to be placed upon low performing programs.
- 2) The “Concerns” part of the team report needs to be reconsidered by the COA and the format for the report should be revised so the team members will clearly understand the expectations of the COA for the report.

***AIR Research Question 2 – Do BIR members feel adequately prepared for their role as peer reviewers to achieve the goals of the system? Do they believe that the policies and procedures under which they are operating enable them to achieve the goals of the system?***

### ***Key Findings:***

- Peer review through site visits by the BIR is highly valued by both IHE representatives and BIR members. Using peers at the K-12 and IHE levels to judge whether and to what degree programs have met the standards is a core element of the *Accreditation Framework*.
- The criteria for team selection are critical to the validity of the accreditation review process, and the *Framework* is clear about these criteria in terms of team size, expertise, and diversity. However, the unavailability of BIR members and/or the unavoidable loss of team members at the last minute may result in a team with one or more members who are poorly and/or insufficiently prepared. This could result in team members who are unable to effectively fulfill their responsibilities in the CCTC’s accreditation process, reduce the effectiveness of the team as a whole, and interfere with the CCTC’s ability to meet *Framework* requirements regarding the criteria for team selection.

***Recommendations regarding the preparedness of peer reviewers:***

- 1) Strengthen team training, particularly in the areas of interviewing.
- 2) Intensify the orientation of accreditation teams.
- 3) Evaluate BIR members' skills post-visit and provide feedback.
- 4) Adopt better technology to allow CCTC staff to more effectively recruit team members.

***AIR Research Question 3 – Do those from institutions of higher education and their graduates who have been involved in accreditation reviews feel that the system allows them ample opportunity to provide the information necessary for a fair and productive review?***

***Key Findings:***

- The intensity and brevity of the accreditation visit is a significant factor in respondents' perceptions of the CCTC accreditation process. IHE representatives, team members and CCTC staff report that the process leaves them physically and mentally exhausted.
- The frequency of the accreditation cycle – occurring approximately every five to seven years – is a significant element in the Commission's system of accreditation, and exists to ensure that institutions maintain quality.

***Recommendations regarding the opportunity to provide information for a fair and productive review:***

- 1) Standardize the formats for documentation required of IHEs specifically regarding standards for the self-study report.
- 2) Provide more and better orientation for institutions new to accreditation.
- 3) Encourage IHEs to develop electronic document rooms in addition to better -organized, hard copy document rooms.
- 4) Conduct candidate interviews when students are available.
- 5) Develop annual surveys for newly credentialed individuals and their employers to provide an additional source of objective data to inform the accreditation system.

***AIR Research Question 4 – What evidence is there that the accreditation review process and the information provided through the review is being used to support program and institutional improvement?***

***Key Findings:***

- Although time-consuming, the process of self-reflection to prepare the institutional self-study is highly valued by IHE representatives and seen as one of the chief benefits of the accreditation process.
- The quality of the data available for use by teams making judgments about institutions' performance against the standards can vary significantly, and this variation affects the validity of those decisions and the teams' overall recommendations to the Committee on Accreditation.

- The accreditation team report is the key piece of data the COA uses to make its decision on an institution's accreditation status. However, the various parts of the report can vary substantially in quality, interfering with the Committee's ability to make its decisions with full confidence in the team's recommendations. The intensity of the accreditation visit often results in conditions that are not conducive to the production of high quality team reports. In addition, IHE representatives are often unprepared for the presentation of their institution's report before the COA, or feel unable to prepare themselves for the interview before the committee.
- The *Accreditation Framework* purposefully ignores past institutional performance against the standards in its accreditation visits; yet the addition of this historical perspective could lead to a deeper, more effective measurement of institutional improvement over time.

***Recommendations regarding the review process supporting program and institutional improvement.***

- 1) Offer more assistance in the development of self-study documents.
- 2) Alter the *Framework* to allow IHEs to provide data about program improvement over time.

## Changing State and National Policy Environment

Significant changes have since taken place within the educational policy environment since 1995 and the adoption of the current *Accreditation Framework*. It may be argued that this changed environment suggests the need for a new examination of CCTC's accreditation processes.

### *State and federal push toward greater accountability*

In the past decade, California, like many states across the nation, has undergone a significant transformation, some even suggest a paradigm shift, towards greater accountability in education. Fueled by dismal student achievement on national standardized tests, anecdotal reports from the business community about the lack of preparation by high school graduates for the demands of a new information-based economy, and large numbers of college students - even those enrolled in California's most selective universities - requiring remedial instruction, public officials began to mandate numerous reforms and require increased demonstration of educational effectiveness. Central to these reforms was the adoption of standards -- student academic content standards as well as new teacher preparation and subject matter preparation standards aligned to those student academic content standards. Also playing a critical role in California's reform efforts was an increased focus on using quantitative measures and demonstration of effectiveness for policy and programmatic decision-making, and additional public disclosure and notification requirements.

Increasingly, the federal government has also demanded greater accountability. During the 1998 reauthorization of the Higher Education Act (HEA), Congress imposed a new system of accountability for the nation's teacher preparation programs and required public disclosures of teacher test results. Title II reporting requirements required that each institution receiving federal financial aid funds report to the states and publicly disclose particular information about their programs, including pass rate information on all required state licensure and certification exams for graduates of their educator preparation programs. States were then required to compile this pass rate data and produce a report to the Secretary of Education, who was in turn required to report to Congress on the state of educator preparation programs nationwide. While critics of the Title II reporting system abound, the implementation of such a system, nevertheless, underscores the desire of public officials to seek quantitative data to evaluate the quality of teacher education programs.

More recently, states are experiencing heightened pressure from the federal level for improving academic achievement of K-12 students and a higher level of accountability. When the *No Child Left Behind Act* (NCLB) was signed in early 2002, Secretary of Education Rod Paige called it a historic reform that "gives states and school districts unprecedented flexibility in how they spend their education dollars, in return for setting standards for student achievement and holding students and educators accountable for results." Undoubtedly, the move to accountability and higher student achievement served as the impetus for the introduction of the *Ready to Teach Act*.

### *H.R. 2211, The Ready to Teach Act: 2003 Reauthorization of the Higher Education Act*

Disappointed by the lack of meaningful data that resulted from the Title II requirements put in place by the 1998 reauthorization of HEA, Congress is once again seeking to revise the reporting requirements for teacher preparation programs. The Ready to Teach Act, introduced in May 2003 by Representative Phil Gingrey and passed out of the House of Representatives in July, intends to align teacher training programs under HEA with the provisions for highly qualified

teachers in NCLB. It is one of the first of several pieces of legislation addressing reauthorization of the HEA. Reforms in this piece of legislation would introduce new quality and accountability measures for teacher training programs, and provide innovative approaches that intend to improve the teaching workforce.

The reauthorization effort currently underway with respect to the Higher Education Act differs significantly from that of 1998 primarily because of the passage of the No Child Left Behind Act. The philosophical underpinnings behind NCLB are undoubtedly driving the reauthorization effort for the Higher Education Act and the clear intent of Congress is that the two Acts be interdependent with respect to the issue of teacher quality. In fact, in the most recent Title II report from Secretary Paige, he says, "If NCLB sets the schedule and the destination of teacher quality reform, then a reauthorized Higher Education Act (HEA) is one important way to get there."

Secretary Paige identified several issues that he says are certain to be the focus of the reauthorized HEA effort: 1) support for the reform of teacher education; 2) promotion of innovative teaching models; 3) removal of barriers and support for inventive approaches to certification; and 4) increase in incentives for teacher recruitment.

*How do the Title II Requirements in H.R. 2211 differ from current Title II requirements?*

The reauthorization proposal contained in H.R. 2211 once again includes resources for the Teacher Quality Enhancement Grants, as did the previous version of Title II. The structure of these grants remains as currently exists, in that Title II would include state grants, partnership grants, and teacher recruitment grants. The goals and objectives of NCLB however, are now identified in the Ready to Teach Act as the primary focus for funding opportunities under these grants programs. However, a new provision included in the Ready to Teach Act requires that states accepting state grants institute a new evaluation system that some have dubbed the "Pupil to Teacher to Program" model whereby student achievement data must be used to evaluate the effectiveness of teachers, which then is used to evaluate teacher preparation programs.

This same general concept is also incorporated into the mandated reporting requirement provisions of Title II. Included in the Act is the requirement that states provide annual, comprehensible accountability report cards on the quality of teacher preparation in the state to the Secretary of Education. Discussions surrounding this aspect of reauthorization have centered around making the reporting requirements more useful. Congressional members have expressed concern over the limited value of the data that has been collected thus far through Title II – an argument with which many states as well as teacher preparation programs can agree.

Among the proposed changes are that certain reporting requirements -- such as pass rates on required certification or licensure assessments -- would be based not on program completers as is currently the case, but on all students who have completed at least 50% of the requirements. Programs would be required to report this information for those students who took the assessments within three years of receiving a degree from the institution or completing the program. Because many states require tests as a condition for licensure and hence for entrance into the profession, pass rates for those who complete programs near 100%, offering little value in the way of evaluating and understanding differences in quality of programs. This proposed change reflects the desire of Congress to better understand the manner in which programs are serving all of its teacher candidates, not simply those who complete a program.



A second major proposed change and one more directly related to the critical work of the Commission, concerns the manner in which the state reports on its processes for ensuring quality of teacher preparation programs. Current Title II language reads:

*For each State, a description of proposed criteria for assessing the performance of teacher preparation programs within institutions of higher education in the State, including indicators of teacher candidate knowledge and skills.*

The proposed language passed by the House in H.R. 2211 reads,

*For each State, a description of proposed criteria for assessing the performance of teacher preparation programs in the State, including indicators of teacher candidate skills and academic content knowledge and evidence of gains in student academic achievement.*

For the past three reporting cycles, the Commission has responded to the requirement related to California's process for assessing the performance of teacher preparation programs in the State by providing information about our current *Accreditation Framework* and processes. Clearly, the proposed changes reflect the concern of Congress about teachers' academic content knowledge and subject matter competence that has been the focus of NCLB. Further, requiring states to consider evidence of gains in student academic achievement in their processes for assessing the performance of teacher preparation programs, suggests the possibility of significant revisions to current program approval or accreditation processes for many states. In addition, while linking student achievement to teacher preparation for the purposes of improving the teaching and learning process is a laudable goal; it certainly presents some significant challenges. The Act would also continue to require states to identify and assist, through the provision of technical assistance, low-performing programs of teacher preparation within institutions of higher education. States shall continue to provide the Secretary with an annual list of such low-performing institutions that includes an identification of those institutions at risk of being placed on such a list as defined by the State.

Currently, the Ready to Teach Act has been referred to and is awaiting hearing in the Senate Health, Education, Labor and Pensions Committee. The Committee held its first hearing on reauthorization of the Higher Education Act on October 16, 2003 however its focus was on issues related to access and affordability of higher education, and has not yet address issues of teacher quality. On October 28, 2003 Senator Ted Kennedy introduced S. 1793 a Higher Education Act reauthorization package that includes, among its many provisions, proposed changes for Title II. Staff is currently analyzing the proposed language of this bill and will report its findings to the Commission in the future. It is also anticipated that the Chair of the Senate Health, Education, Labor, and Pensions Committee will introduce a reauthorization bill on behalf of the Committee and that Administration is also likely to propose its own plan. As such, it is unclear whether the language included in the Ready to Teach Act will remain in the final version of the reauthorization bill.

#### *Implications for Accreditation*

With both the federal push for a new and higher accountability for teacher training programs and the states in which they operate, as well as internal pressure from within the State and a general move towards performance based, data-driven decisions, it may be advisable that agencies responsible for ensuring teacher quality revisit accreditation to ensure alignment with new

measures such as NCLB and HEA. Specifically, an examination of whether the current accreditation process remains a viable process under the changing landscape of accountability for teacher preparation programs may be necessary.

### **Summary of Staff Efforts to Date**

While the AIR report provides useful information and recommendations, it is limited in focus to the accreditation system as it currently exists. Its charge was not to suggest alternative scenarios or design options, but to examine the system within the existing parameters of structure and statute. In order to accomplish the Commission's objectives to implement a stronger, more cost-efficient system that ensures meaningful oversight of educator preparation programs, additional information was needed to augment that provided by AIR.

In particular, over the past several months, Commission staff has engaged in the following:

- 1) Compiled a summary of accreditation visits and findings from 1997 to present
- 2) Conducted a survey of 12 states and their accreditation policies and procedures
- 3) Examined costs involved in the Commission's existing accreditation process
- 4) Examined the potential impact of federal and state accountability measures such as the Ready to Teach Act on accreditation practices.
- 5) Held two discussion sessions with the Committee on Accreditation
- 6) Engaged in preliminary discussion of data sources that might be collected and utilized in a revised accreditation process

#### *Compiling a summary of accreditation visits and findings from 1997 to present.*

In order to gain a general understanding and perspective on the size and scope of the Commission's on-going responsibilities with respect to accreditation, staff began by compiling a summary of accreditation visits and findings from 1997 to the present.

From 1997-98 to 2002-03, the Commission conducted a total of 73 accreditation visits at institutions of higher education and district internship programs. (Sixteen institutions or district offices were originally scheduled for accreditation visits during 2002-03, however only 6 visits were actually conducted due to the December 2002 hiatus issued by the Commission on all accreditation visits except merged NCATE visits.) Using the five years preceding the cancellation of visits, the number of accreditation visits per year ranged from 11 to 17 with an average of 13 visits per year.

Of the accreditation visits conducted from 1997 to 2003:

- 36 institutions, or 49 percent, received full "Accreditation" from the Commission;
- 17 institutions, or 23 percent, received a finding of "Accreditation with Technical Stipulations" from the Commission;
- 20 institutions, or 27 percent, received findings of "Accreditation with Substantive Stipulations" from the Commission; and
- No institution received either a finding of "Accreditation with Probationary Stipulations" (implemented as a possible finding in 2000-01) or "Denial of Accreditation" by the Commission.

The following chart summarizes accreditation visits for 1997 through 2003 and findings during this period by system.

	<b>Total Reviews</b>	<b>Accreditation</b>	<b>Accreditation/ Technical Stipulations</b>	<b>Accreditation/ Substantive Stipulations</b>
<b>California State University</b>	19	9	4	6
<b>University of California</b>	8	7	1	0
<b>Independent/ Private Institutions</b>	42	19	11	12
<b>District Intern Programs</b>	4	1	1	2

*Summary of Survey related to Accreditation Policies and Practices in Other States*

One of the primary activities undertaken by staff was to survey other states in order to obtain a better understanding of the general trends in accreditation at the present time. The purpose of the survey was to identify the processes and procedures used by other states and to identify key issues or areas of interest that might be useful to investigate in greater depth in the future.

Staff developed an electronic survey instrument and followed up with telephone conversations as necessary. Twelve states were chosen with consideration given to geographic distribution, number of institutions in the state offering educator preparation programs, similarity with California in terms of size and diversity of student population, Title II information regarding assessment requirements, variety in structures of accreditation systems, relationship and partnerships with NCATE, and discussions with Commission staff about which states appear to be moving toward greater accountability in their accreditation processes.

Based on these considerations, staff surveyed the following states: Connecticut, Florida, Illinois, Indiana, Maryland, Massachusetts, New York, North Carolina, Pennsylvania, Texas, and Washington. Staff attempted, but was not successful, in receiving sufficient information from Wisconsin.

Below is a summary of some of the findings of this survey:

*Use of NCATE:* While all states use NCATE accreditation processes to some extent, the manner in which it is used varies widely from being a requirement in some states, to allowing optional NCATE accreditation that is not used in any way in the state process of accreditation or approval.

*Entity that is reviewed by the states:* Of the states surveyed, there is a fairly even distribution in the approach taken by states toward the entity that is reviewed. Five states surveyed have a program approval process while six states accredit educator preparation sponsors as a whole as California currently does.

*Type of process:* All states surveyed use a standards-based system. Ten of the eleven states surveyed use a combination of standards and performance-based systems; however, the definition of "performance-based" differs significantly among the states.

*Accreditation cycle:* Most states have an accreditation cycle of 5 years, but cycles ranged from the Texas system of pass rate review on an annual review cycle to New York's relatively new system that has a 7 year cycle. Some states indicated that they are considering changing to a 7-year cycle as NCATE is moving to a seven-year cycle.

*Accreditation methods used:* Ten of the 11 states surveyed use a peer review process that includes both document review and site visits. Seven states surveyed include a separate state process of document review and site visits. Eight states surveyed use quantifiable data in their process of accreditation or program approval. However, it was difficult to determine exactly how the data are used in the accreditation process.

*Costs:* In general, both states and institutions bear the burden for the accreditation costs. Washington state, however, was explicit in their use of teacher certification fees to cover accreditation-related costs.

*Length of time the system was in place and anticipated changes:* Only three states have had their systems in place for less than six years: Pennsylvania, Washington, and New York. Several states have made revisions to requirements of their systems in recent years. None of the states surveyed are planning revisions in the near future, except to change the frequency of their cycle to be consistent to that of NCATE.

*Annual data reporting:* Five states surveyed have annual reporting systems (other than the federally required Title II reporting system) for use in monitoring or accreditation activities. Florida requires five self-studies in a five-year cycle. Indiana requires what they term a "Unit Assessment System" that is reported by institutions and is used in the monitoring of programs and identifying weaknesses for accreditation purposes. Maryland requires an annual Teacher Preparation Improvement Plan. Washington collects annual survey data from employers, students, and alumni that are then used to identify areas of technical assistance to institutions. North Carolina requires an annual Institution of Higher Education Performance Report and an additional annual report if an institution falls below the 70% pass rate on Praxis exams. A sixth state, Texas, bases its entire accreditation process on an annual assessment of test results on required licensure and certification examinations taken by teacher candidates.

#### *Examined Costs of Existing Accreditation Process*

Staff gathered information about the actual costs to the Commission of supporting the existing accreditation process.

In examining the information provided for 2000, 2001, and 2002, the average annual cost to the Commission for accreditation related activities was \$197,405. Staff gathered the information for 2003, but did not include it here because the reduced costs as a result of the cancelled accreditation visits do not accurately reflect the costs of accreditation activities in a "normal" accreditation year. This 3-year average cost represents expenditures related to (1) previsits conducted by the Commission consultant in charge of the accreditation process for that institution and the team leader, (2) on site reviews with accreditation review teams, (3) meetings of the Committee on Accreditation, (4) training sessions for the Commission's Board of

Institutional Reviewers, and (5) revisits to institutions that were deemed necessary during the course of the accreditation process.

The range of costs for the site visit only was approximately \$1,300 for a single district intern program to over \$30,000 for a large multi-campus, multi-program institution. The average cost of the site visits alone, without factoring in the other accreditation related costs listed above, was approximately \$10,000. The cost of the site visit is directly related to the number of programs offered by an institution, the number of sites where the programs are offered by the institution, size of enrollment, size of faculty, and type and number of services offered by the institution. All of these factors contribute to the size of the review team -- which has ranged from two to 33 -- which then dictates the cost of the site visit.

Significant costs related to accreditation are also borne by the institution under review. Usually, preparation for accreditation reviews begins two or more years in advance. Numerous hours of administrator and faculty time are expended to accomplish the tasks related to preparation for the visit, preparation of materials, development of the self study document, creation of document rooms that contain the evidence for review teams, and coordination of the visit itself such as establishing the interview schedule and other logistics for the meeting, are just some of the activities for which costs are expended by an institution. Data were not collected by staff to document the costs to the institution undergoing accreditation reviews by the Commission.

#### *Examined the potential impact of federal and state accountability measures such as the Ready to Teach Act on accreditation practices*

As previously discussed, the Commission staff has been cognizant of the increased expectation that educational programs be held accountable. In addition to the specific legislation mentioned earlier, staff is taking into consideration changes occurring at the national level with respect to accreditation. A focus on performance is cited by NCATE as a new hallmark of its accreditation procedures. In addition, the federal government has indicated a desire to examine new ways of certification and licensure, as illustrated by the expansion of funding to the American Board for Certification of Teacher Education (ABCTE). This latter effort could suggest that it would be advisable for teacher education programs to find new and compelling demonstrations of their effectiveness with respect to classroom instruction.

#### *Discussion with the Committee on Accreditation*

Recognizing the extensive knowledge base and expertise of the individuals that serve on the Committee on Accreditation, staff held an initial discussion session with members of the Committee during its regularly scheduled meeting on August 21, 2003. During that meeting, staff and members of the Committee discussed federal legislation, in particular H.R. 2211 - the Ready to Teach Act -- and possible implications for accreditation, the results and recommendations of the Reading Standard Review Study, a summary of accreditation visits and findings since 1997, costs to the Commission related to the accreditation activities, staff survey of other states, and the findings and recommendations of the AIR report. In addition, staff engaged the Committee in a discussion of general policy questions related to accreditation.

Staff had a second opportunity to engage the Committee on Accreditation in discussion about advice it would give to the Commission in developing a redesigned accreditation system. Again, the discussion occurred during the Committee's regularly scheduled meeting on October 23, 2003. This discussion centered around four primary policy goals identified by staff and that are included in the next section of this report for the Commission's consideration. Staff explained

that it was not the intent to create consensus around these issues at that time, but that each member of the Committee was free to share his or her views as individuals who have acquired a substantial body of knowledge and expertise in the field of educator preparation. Staff is pleased to report that the Committee members were extremely candid about areas in which they believed improvement could be made to the system as well as what they believed to be the strengths of the existing system. Committee members made numerous helpful suggestions for potential areas to examine in greater depth. Some of the comments of members of the Committee on Accreditation are reflected below in the discussion of the four policy goals. At the conclusion of their discussion, members of the Committee on Accreditation offered their support for the Commission's current desire to revise the accreditation system but cautioned that any changes ought to build on what the Commission has learned about accreditation over the years and that any proposed changes ought to improve upon that system.

*Preliminary discussion of possible data sources that might be collected and utilized in a revised accreditation process*

Staff has begun investigating possible data sources that might be collected and utilized in a revised accreditation process. Currently, some data are available on an annual basis through federal Title II reporting requirements. Other data are collected during the accreditation process and still other data is not collected in a consistent manner at all. Staff has begun the process of identifying the data that could easily be collected and analyzed routinely as well as data that would be useful but is not currently collected and the steps that would need to take place in order for that to occur. Future reports will include a much more comprehensive discussion of this important topic.

## **Proposed Plan to Revise the Current Accreditation Framework and Procedures**

The efforts undertaken by staff thus far serve to help inform and guide a new revised accreditation system that addresses the current context. Using the research conducted thus far by staff and its understanding of the current federal and state policy environment, Commission staff identified four major policy goals that, at a minimum, a new revised accreditation system should seek to achieve. These four policy goals are listed below. As previously stated, these four policy goals served as the central focus of the discussion with the Committee on Accreditation. Following each policy goal statement below, staff offer comments based on the information collected thus far and to the extent possible, the Committee on Accreditation's discussion is summarized as well.

### **Goal 1. Strengthen the Commission's accreditation process by incorporating additional quantitative data sources to help inform accreditation reviews and decision-making and complement the body of evidence already collected and analyzed.**

The general trend toward more accountability in education includes a greater reliance on objective, quantitative data. Currently, a great deal of data is gathered and utilized by review teams during the accreditation process. However, that data is collected only on cycles aligned with their accreditation cycle and institutional review. Much more can be done to collect and report data from programs that may be useful and informative in making decisions about the quality of a program. In addition, the Commission should seek to improve the consistency and frequency by which data is collected from all programs. The Commission should seek ways that quantitative data can be used to identify potential issues that affect quality of services offered by

a program as well as to identify those institutions that appear to offer high quality services to their participants. In addition, while “input” data (enrollment, number of classes offered, number of full time faculty, etc) continues to be important sources of data for understanding the services offered by an institution, policymakers are increasingly encouraging and often, mandating data related to educational outcomes and demonstration of program effectiveness. A revised accreditation system should reflect this new environment.

The Committee on Accreditation generally supported the notion of collecting and reporting quantitative data for use in the accreditation process and expressed general support for doing so on an annual basis. Members expressed concern about the potential for over-reliance on quantitative data alone and emphasized the need to ensure that quantitative data are used in conjunction with a qualitative assessment of how well the institution is meeting the standards. Members also emphasized that the importance of collecting the data was to ensure that institutions and programs were using data to drive change within their programs and noted that the collection of the data by itself is far from sufficient. Some expressed a desire to be able to assess the growth or gains that an institution is making and much discussion occurred about ensuring that data related to contextual issues in which the institution operates such as the demographic characteristics of their student body, the number of challenging schools served, and the part-time/full-time nature of their students for example, were also part of any plan to include quantitative data. Several committee members acknowledged that the Commission’s accreditation system should not discourage institutions from addressing those challenges or penalize institutions that do. Several members of the Committee also discussed the issue of limited resources and that the costs associated with the collection of new or additional data may be problematic for institutions as well as the Commission.

**Goal 2. Reconsider and redesign the current institutional review process to ensure greater consistency, validity, objectivity, and responsiveness.**

The AIR report, members of the Committee on Accreditation, and staff have all identified potential changes in policies and procedures that could improve the Commission's accreditation system to ensure greater consistency, validity, objectivity, and responsiveness. For example, one of the areas identified by all was the limitation of the existing system to ensure that institutions were actually making changes and improvements cited during the accreditation reviews, regardless of whether the institution was cited for stipulations or not. Currently, those institutions cited with stipulations must report back in one year. However, the Commission has little ability outside of this cycle to question or conduct a review of that institution even if there may have been some significant changes occurring at the institution or a compelling reason comes to light.

The Committee on Accreditation discussed numerous issues related to this goal. Primary among them was the somewhat inflexible nature of the accreditation process to allow the COA to respond as it deems most appropriate and with a great deal of assurance that institutions are following through on promises made. Several members of the Committee voiced support for the notion of building into the system greater discretion and flexibility to allow for appropriate follow-up to ensure that actions were indeed being taken by the institutions. Several members noted that one of the weaknesses of the current system has been that it does not allow for an on-going process of monitoring of programs, but rather a comprehensive look at the quality of programs at a point in time. In addition, the Committee had numerous suggestions for improving the consistency in accreditation reviews.

### **Goal 3. Reconsider the design of the current institutional review process to reduce costs.**

As previously discussed, the cost to the Commission to support accreditation related activities are substantial. Further, the costs to the institution are also considerable. Nevertheless, the Commission is entrusted with the responsibility to ensure that the licenses it awards to individuals certifies that the preparation they have received meets a minimum standard of quality and effectiveness.

While a new revised accreditation system may or may not reduce costs, particularly if new data systems are needed to support the quantitative aspects of the system, it nevertheless should be a consideration, particularly given the current resource constraints.

The Committee on Accreditation discussed various options for reducing costs. Some members expressed caution at reducing the size of review teams commenting that various types of expertise are needed to ensure the quality of the reviews. However, other ideas with potential surfaced such as the use of electronic document submissions as contrasted with more traditional document and exhibit room, and lengthening the timeframe between site visits, particularly if data are collected from programs more frequently. The idea of conducting focused visits appears to hold some promise if an effective and consistent process or criteria can be established to determine exactly when, under what circumstances focused reviews could take place.

### **Goal 4. Reconsider and redesign the role of the Commission and the Committee on Accreditation.**

California Education Code designates the Commission with the exclusive authority to adopt standards for educator preparation and to make all other policy decisions that govern the system of professional accreditation in education. The Education Code assigns the Committee on Accreditation with the responsibility for carrying out the Commission policies with respect to accreditation, making decisions about the accreditation of institutions that prepare educators for California, for enforcing the Commission's preparation standards and annually reporting its activities to the Commission.

The creation and use of a Committee on Accreditation, consisting of 12 professional educators selected by the Commission for their distinguished records of accomplishment in education, has allowed for a deliberative and thorough process of review and of review teams findings and accreditation recommendations. By removing the discussions from within the purview of the Commission itself, which must consider and discuss numerous statewide issues at its meetings and is under more rigid time constraints given its comprehensive workload, and placing it within a body whose sole purpose is to consider accreditation findings and recommendations, has allowed for appropriate attention to be focused on important institutional level issues. However, there is little interaction between the Commission and its Committee on Accreditation except for the review of the annual reports. There may exist other configurations or means of communication between COA and the Commission that should be explored further. In their discussion of this topic in October, the Committee on Accreditation also noted the important role of staff in the accreditation process. While some members recognized that the efforts of staff in the process raise the level of understanding of the COA and ensure a thoughtful and deliberative process, others noted that NCATE staff does not take part in any manner in NCATE reviews.



## **Proposed Plan and Timeline**

With Commission agreement, the goals described above would continue to serve as the goals for the next phase of activities. Staff proposes that the Commission consider the following timeline for activities.

December 2003. The Commission discusses goals of accreditation revision and possible conceptual changes to the key elements of the existing accreditation system identified. The Commission directs staff to begin developing a revised accreditation system based upon these guiding tools and in accordance with the prescribed timeline.

January – February 2004. Commission staff will consider options and alternatives for a revised accreditation system. Commission staff will identify a preferred revised accreditation system and drafts agenda item for Commission discussion in March.

March 2004. Based on the information collected to date, the identified policy goals, and conceptual changes in the key elements for an accreditation system, the Commission staff will present the components of a revised accreditation system for Commission discussion.

April 2004. Commission staff will then incorporate comments provided by the Commissioners at the February Commission meeting and begin accepting public comment on the proposed plan. Commission staff will utilize a web-based survey mechanism similar to that used by the Commission in the past to collect comments.

May 2004: Staff will compile and analyze public comment and make revisions as appropriate. Staff will revise plan and prepare an agenda item for the Commission.

June 2004: Commission may consider and adopt a new accreditation system for use to assess quality in teacher preparation program.

Beyond 2004: Depending on the direction taken by the Commission, legislation may be needed to pursue changes in the *Accreditation Framework* and relevant statutes related to accreditation.

## **Elements of the Existing Accreditation System**

In order to begin executing the above timeline, staff would find it helpful if the Commission could discuss and consider the following seven key elements of California's existing accreditation model identified by the AIR study. In addition, staff is recommending that the Commission consider three additional elements for incorporation in a revised system.

### *1. Standards-based System*

At the center of the Commission's current accreditation system are professionally derived and supported common and program standards that define the acceptable level of program quality for educator preparation programs. The common standards describe aspects of program quality that are common to all programs offered by an institution such as educational leadership, resources, faculty, evaluation, admissions, and advice and assistance. Program standards are those standards specific to particular aspects of each program such as program design, curriculum, field experience, and knowledge and skills to be demonstrated by candidates. All accreditation decisions are based on whether an institution has met these standards.

The information collected by staff thus far suggests that no change is needed to this element of the Commission's accreditation system. In the survey conducted of other states, all 11 other states surveyed used standards as a central component in their accreditation process. In fact, the use of standards appears to continue to be a strong and consistent part of educational accountability trends and supported by most policymakers and educators alike. State academic content standards for K-12 continue to be strongly supported and central to California's educational reform movement. Data from Title II of the Higher Education Act indicates that 41 states across the nation have either adopted quality and effectiveness standards for their educator preparation programs that are aligned with their K-12 academic content standards or are moving toward that alignment. In some instances, California's standards have been used as models of exemplary standards. In the report *Meeting the Highly Qualified Teachers Challenge*, issued in July 2003, U.S. Secretary of Education Rod Paige in describing standards developed by the American Board Certification for Teacher Education (ABCTE), characterized California's standards (along with those of Virginia and Massachusetts) as "among the finest in the nation." (page 26).

## *2. Institutional Focus*

California's existing system of accreditation focuses on the institutional accreditation rather than individual program approval or accreditation. However, this represented a major shift from previous California practice of program approval. Some of the assumptions in making this change are that unit accreditation fosters collaboration among programs, streamline and make more efficient and cost effective the accreditation process, and allow for the combination of information and judgments about the various programs with that of the institution as a whole.

The information collected thus far suggests no change is needed currently in this approach to accreditation. Even though the current system provides findings about programs, program approval holds specific advantages. It allows for the Commission to independently make decisions for each and every program and thus places additional pressure on institutions to address those concerns specifically. Some proponents of this approach suggest that under institutional review, it would take very serious deficiencies in one or more programs to bring down the level of full accreditation of an institution.

## *3. Professional Judgment and Peer Review*

The Commission's *Accreditation Framework* emphasizes the professional character of accreditation. It notes that key to the accreditation process is that professional educators should hold themselves and their peers accountable for the quality of professional education and that professional educators should be involved in the creation of standards, in conducting reviews, and making accreditation decisions.

In general, the information collected thus far by the Commission staff suggests that professional educators should continue to play a central role in accreditation reviews. However, Commission staff could also conceive of various scenarios, particularly around the collection and use of quantitative data, where Commission staff could play a more active role. In addition, some members of the Committee on Accreditation agreed that a modified system might include some preliminary staff review and recommendations and might reflect the type of review system utilized by NCATE. One Committee member mentioned the need to pay greater attention to some conflict of interest issues related to the use of professional educators for accreditation purposes. The exact role played by professional educators and by Commission staff will depend

largely on the nature of the revised processes and procedures ultimately adopted by the Commission.

#### *4. Internal Self-Study*

The internal self study document prepared by the institution is the primary means by which the institution demonstrates that the programs and services it offers are aligned with the standards of quality and effectiveness adopted by the Commission. One of the primary objectives of the document is to ensure that the institution has the opportunity for self-reflection and ultimately, to use that self-reflection to drive program improvement. Currently, the document is fairly comprehensive and it is compiled once in preparation for the accreditation visit. While it is hard to imagine an accreditation process that does not include the institution's own demonstration of the manner in which it meets each of the standards, it is quite possible that issues related to the format, the comprehensive nature, the frequency and timing of the document may be altered.

#### *5. External Review*

California's current accreditation system is dependent upon an on-site review as the primary means for conducting an external review. There are numerous advantages to such a system. It allows for the comprehensive collection of data not available from documents, it allows for a process of dialogue and deliberation with the institution that allows for a more thorough understanding of the issues and the context in which the institution is operating, and allows for a team of experts to discuss complex issues with one another prior to making an accreditation recommendation.

Based on the information collected by staff thus far, external review is an essential component of accreditation. However, it is clear that there are numerous ways that external review may take place. For instance, while most of the states surveyed do conduct site visits as a primary means of external review, many of them supplement these site visits with more frequent information collected from the institutions. While the information collected from these institutions vary and the manner in which the information is eventually used in the accreditation process varies, it appears that many states do not rely on the site visit alone to understand issues of program quality. The Commission should investigate alternative external review models to determine what might yield the most useful information to the Commission in making critical accreditation decisions.

#### *6. Regular Review Cycle*

One of the central notions of California's accreditation process is that all institutions must undergo regular review cycles. California's current accreditation cycle occurs on a five- to seven-year basis, and is commonly six years. The notion of regularly scheduled review cycles is based on the issue of fairness to all institutions. In addition, since the review is a "point in time" review, that is, assesses the quality of the institution at the time of the review, it is assumed that regular accreditation cycles will be able to capture and respond to any changes that take place at an institution during that period.

Based on the information reviewed to date, staff recommends that the Commission reassess the review cycle used in its accreditation process. One of the persistent concerns about the current accreditation system used by the Commission is the length of time between accreditation reviews and the inability for the Commission to monitor on an on-going basis what is occurring at institutions. It is possible, under the current system, that an institution having achieved accreditation in one year may undergo substantial changes in the following year that may or may

not have a significant impact on the quality of services provided to its teacher candidates. Under this scenario, the Commission would have little ability under its existing system to review the quality of the programs until the institution's next regularly scheduled cycle.

At the same time, it is not reasonable to assume, given the current fiscal constraints of the Commission, that the Commission would be able to conduct full site visits in the manner in which it does more frequently than the six-year cycle. However, the Commission could build into its system more regular monitoring of institutions and develop explicitly designed criteria by which it may allow for focused reviews, that is, reviews focused on particular standards or points of concern of institutions where appropriate.

While a six-year cycle appears to be in line with that of other states, and with national trends, more states are requiring annual reporting systems for their teacher education programs. These annual reporting systems differ from state to state in both content and use. Commission staff believes that further investigation of the range and scope of the annual reporting systems used in other states may help assist California in developing a more responsive accreditation system. The collection of annual or, at least, more frequent data from institutions may help identify emerging problems at institutions as well as confirm that institutions that have been deemed to offer high quality educational services continue to offer no evidence to the contrary.

#### *7. Emphasis on Current Quality Rather than Over Time*

California's current accreditation process examines the quality of a program and its services at a point in time. Accreditation decisions do not take into account past team recommendations or accreditation decisions. It is based on the general assumption that this is the fairest manner to conduct accreditation decisions such that an institution is judged on its current state of quality, not past weaknesses or strengths. It also takes into account that standards change over time and to look at past practices may not be an equitable way of looking at accreditation.

While there is merit to this manner of approaching accreditation, the information collected from staff to date indicate that there is an increasing need to ensure consistency in the quality of services offered by an institution over time. The Committee on Accreditation discussed this aspect of the existing accreditation system in detail. Many members expressed concern over the Commission's inability to monitor the progress that institutions are making in addressing issues raised during the accreditation process. Despite the fact that institutions receiving stipulations are required to address those stipulations within one year of the accreditation review, some members of the Committee on Accreditation expressed concern that this process may be less than sufficient to ensure that institutions were, in fact, addressing concerns. In addition, the existing accreditation system does not allow for an understanding of persistent and continuing problems at an institution because of the inability to reference the findings of past reviews.

As a result, the Commission staff recommends that this element of the existing accreditation system be considered in a revised plan for accreditation.

From the information gathered thus far, Commission staff asks that the Commission consider the addition of the following key elements for incorporation in a revised accreditation system.

1-California's accreditation system should be aligned with state and national accountability trends. The system should be consistent and responsive to new accountability requirements such as those contained in the reauthorized Title II of the Higher Education Act.

2-California's accreditation system should be focused on institutional effectiveness as well as program quality. By design, California's standards for teacher preparation include both issues of quality *and* effectiveness. In the past, the accreditation process has been an effective tool for gauging the quality of educational services offered by an institution. However, little in the way of outcome data has been collected to determine the institution's effectiveness.

3-While the issue of fairness to all institutions should continue to remain an important goal of the accreditation process, California's accreditation system should be designed to ensure enough flexibility to respond in a timely manner to possible concerns identified at institutions while taking into consideration those institutions with demonstrated effectiveness.

#### *Other important considerations*

The complexity of developing revisions to accreditation cannot be underscored. In developing revisions for the Commission's consideration, staff acknowledges that there are numerous tangential, but critically important issues that will need to be addressed. For instance, the Commission's relationship with NCATE must be considered carefully. The current partnership with NCATE has significant advantages for both the Commission and the institutions seeking approval. The impact of any proposed revisions on that partnership must be carefully considered. In addition, there are specific and important considerations for particular program areas. For instance, the accreditation of Education Specialist programs require that we examine these in their own unique context of state and national activities.

#### *Recommendation*

Commission staff recommends that the Commission agree to the proposed four policy goals for developing a revised accreditation system, agree to the proposed timeline for revision, and consider the conceptual changes to the key elements of the existing accreditation system.

